

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	5:21-CV-0844-XR
	§	(Consolidated Case)
GREGORY ABBOTT, et al.	§	
<i>Defendants.</i>	§	

OCA-GREATER HOUSTON, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	1:21-CV-0780-XR
	§	
JOSE A. ESPARZA, et al.	§	
<i>Defendants.</i>	§	

HOUSTON AREA URBAN LEAGUE, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	5:21-CV-0848-XR
	§	
GREGORY WAYNE ABBOTT, et al.,	§	
<i>Defendants.</i>	§	

TEXAS LULAC, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	1:21-CV-0786-XR
	§	
JOSE ESPARZA, et al.,	§	
<i>Defendants.</i>	§	

MI FAMILIA VOTA, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	5:21-CV-0920-XR
	§	
GREG ABBOTT, et al.,	§	
<i>Defendants.</i>	§	

DEFENDANTS REBECCA GUERRERO¹ AND JOSÉ GARZA'S
DESIGNATION OF POTENTIAL TESTIFYING EXPERTS

Pursuant to the Court's November 18, 2021 Scheduling Order (ECF No. 125), Defendants Rebecca Guerrero and José Garza, by and through their undersigned attorneys, hereby submit this Designation of Potential Testifying Experts. Defendants Guerrero and Garza reserve the right to designate and call additional or different witnesses based upon further discovery, any Court pretrial rulings, or evidence presented at trial, including rebuttal witnesses. Defendants Guerrero and Garza further reserve the right to call any witnesses identified by Plaintiffs, Co-Defendants or Intervenors on any of their potential or final witness lists.

I. POTENTIAL TESTIFYING EXPERTS

Attorney Fees Experts

The following individuals may testify as to reasonable and necessary attorney's fees in defense of this case:

1. Leslie W. Dippel
Assistant Travis County Attorney
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2. Sherine E. Thomas
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¹ Effective January 28, 2022, (now former) Travis County Clerk Dana DeBeauvoir, who was sued and previously appeared as a defendant in this matter in her official capacity only, retired from her elected office as Travis County Clerk. Defendant DeBeauvoir was succeeded in office by Rebecca Guerrero, who was appointed as Travis County Clerk by the Travis County Commissioners Court, effective January 28, 2022. Pursuant to Federal Rule of Civil Procedure 25(d), Travis County Clerk Rebecca Guerrero is automatically substituted for former Travis County Clerk Dana DeBeauvoir.

3. Anthony J. Nelson
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4. Patrick Pope
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By: /s/ Anthony J. Nelson
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**ATTORNEYS FOR DEFENDANTS
REBECCA GUERRERO AND JOSÉ GARZA,
IN THEIR OFFICIAL CAPACITIES AS
TRAVIS COUNTY CLERK, AND
DISTRICT ATTORNEY, RESPECTIVELY.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this motion was served through the Court's CM/ECF Document Filing System upon each attorney of record and the original upon the Clerk of Court on this the 23rd day of March, 2022.

/s/ Anthony J. Nelson

ANTHONY J. NELSON

PATRICK T. POPE

Assistant County Attorneys